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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYMOND JESSE RODRIGUEZ,

Defendant.

CASE NO. 1:24-CR-00142-KES-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE AND EXCLUDE TIME; AND
ORDER**

The parties stipulate as follows:

1. A grand jury indicted the defendant on June 20, 2024, charging him in count one of violating 18 U.S.C. § 922(g)(1) – Felon in Possession of Ammunition. The defendant appeared and was detained on June 21, 2024. This case is set for a status conference on February 26, 2025. Time has been excluded to that date.

2. The government produced initial discovery on June 26, 2024, and supplemental discovery on July 22, 2024. On August 6, 2024, defense made a plea offer to the government. The government made its own plea offer on October 15, 2024, which had expired.

3. On December 9, 2024, defendant's counsel withdrew, and the Court appointed Adilene Flores Estrada to represent the defendant on December 13, 2024. The government re-produced its discovery to Ms. Flores Estrada on December 17, 2024. The government intends to extend a plea offer to

1 the defendant's new counsel.

2 4. Now, the parties agree to continue the status conference from February 26, 2025, to April
3 9, 2025, to further provide defendant with reasonable time necessary for effective preparation, so that the
4 defendant can review the discovery, and for defendant to consider a pre-trial resolution of the case.

5 5. The parties agree that the interests of justice served by granting this continuance outweigh
6 the best interests of the public and the defendant in a speedy trial. The parties also agree that the period
7 from February 26, 2025, through April 9, 2025, should be excluded. Fed. R. Crim. P. 17.1; 18 U.S.C. §
8 3161(h)(7)(A) and (h)(7)(B)(iv).

9 IT IS SO STIPULATED.

10 Dated: February 13, 2025

MICHELE BECKWITH
Acting United States Attorney

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13 /s/ Cody Chapple

Cody Chapple
Robert L. Veneman-Hughes
Assistant United States Attorney

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16 Dated: February 13, 2025

/s/ Adilene Flores Estrada

Adilene Flores Estrada
Law Office of Adilene Flores Estrada
Counsel for RAYMOND JESSE
RODRIGUEZ

ORDER

The Court has read and considered the parties' stipulation to continue the status conference and exclude time. The Court finds there is good cause for the continuance so as to allow the defendant reasonable time to complete his review of the discovery and fully consider a pre-trial resolution of the case. The Court also finds that the interests of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Therefore, for good cause shown:

1. The status conference is continued from February 26, 2025, until **April 9, 2025, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**; and
2. The period from February 26, 2025, through April 9, 2025, shall be excluded pursuant to Fed. R. Crim. P. 17.1; 18 U.S.C. § 3161(h)(7)(A) and (h)(7)(B)(iv).

IT IS SO ORDERED.

Dated: **February 13, 2025**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE